

The Honorable Benjamin H. Settle

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT TACOMA

JOHN DOE #1, an individual, JOHN DOE #2, an
individual, and PROTECT MARRIAGE
WASHINGTON,

Plaintiffs,

v.

SAM REED, in his official capacity as Secretary of
State of Washington, BRENDA GALARZA, in her
official capacity as Public Records Officer for the
Secretary of State of Washington,

Defendants.

No. 09-cv-05456-BHS

WASHINGTON COALITION FOR
OPEN GOVERNMENT'S MOTION
FOR LEAVE TO FILE DOCUMENTS
UNDER SEAL

NOTE ON MOTION CALENDAR:
JUNE 29, 2011

Pursuant to Local Rule 5(g), Washington Coalition for Open Government ("WCOG") hereby moves the Court for an order permitting WCOG to file under seal its Motion for Summary Judgment and the Declaration of Steven J. Dixson in Support of WCOG's Motion for Summary Judgment, and the attached Exhibits A-R.

WASHINGTON COALITION FOR OPEN
GOVERNMENT'S MOTION FOR LEAVE
TO FILE DOCUMENTS UNDER SEAL 1



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1 The Court has previously ordered that the names of the John Doe Plaintiffs, and their
 2 witnesses brought forward to offer testimony during the discovery process, shall remain
 3 confidential at least until the date of trial or contrary order of the Court. (Dkt. 181). It is
 4 necessary for WCOG to identify these individuals in support of its Motion for Summary
 5 Judgment in this matter. Due to the size and depth of the testimony presented in the Motion and
 6 supporting Declaration, redaction is not feasible in this matter. Although WCOG does not
 7 believe the identity of the witnesses nor their testimony should be confidential, WCOG moves to
 8 file its Motion and supporting Declaration under seal in compliance with the Court's Order.
 9

10 A proposed Order is submitted herewith.

11 DATED this 29th day of June, 2011.

12
 13 WITHERSPOON • KELLEY

14
 15
 16 /s/ Steven J. Dixon

17 DUANE M. SWINTON, WSBA NO. 8354
 18 LESLIE R. WEATHERHEAD, WSBA NO. 11207
 19 STEVEN J. DIXSON, WSBA NO. 38101
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 26 Open Government
 27
 28



CERTIFICATE OF SERVICE

1
2 I, Steven J. Dixon, am a citizen of the United States and a resident of the State of
3 Washington. I am over the age of 18 years and not a party to the within action. I am employed
4 by the law firm of Witherspoon · Kelley, P.S., 422 W. Riverside Avenue, Suite 1100, Spokane,
5 Washington.
6

7 2. On the 29th day of June, 2011, I caused to be served upon the parties via the
8 CM/ECF filing system, the WASHINGTON COALITION FOR OPEN GOVERNMENT'S
9 MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL, which system will send
10 notification of such filing to the following:
11

12 Stephen Walter Pidgeon, Stephen.pidgeon@comcast.net
13 James Jr. Bopp, jboppjr@aol.com
14 Scott F. Bieniek, sbieniek@bopplaw.com
15 Joseph E. LaRue, jlarue@bopplaw.com
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17 Jay Geck, jayg@atg.wa.gov
18 William Clark, billc2@atg.wa.gov
19 Kevin J. Hamilton, khamilton@perkinscoie.com
20 William B. Stafford, wstafford@perkinscoie.com

21 I declare under penalty of perjury under the laws of the State of Washington that the
22 foregoing is true and correct.
23

24 /s/ Steven J. Dixon, WSBA #38101
25 Steven J. Dixon
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27
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